## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

WSOU INVESTMENTS, LLC d/b/a	§	
BRAZOS LICENSING AND	§	
DEVELOPMENT,	§	CIVIL ACTION NO. 6:20-CV-00494-ADA
	§	
Plaintiff,	§	
v.	§	JURY TRIAL DEMANDED
	§	
ZTE CORPORATION; ZTE (USA), INC.;	§	
AND ZTE (TX), INC.,	§	
Defendant.	§	

## UNOPPOSED MOTION TO EXTEND RESPONSE BRIEF DEADLINES TO MOTIONS TO DISMISS

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development ("WSOU") files this unopposed motion to extend the deadline to file a response to Motions to Dismiss<sup>8</sup> filed by defendants ZTE Corporation; ZTE (USA), Inc.; and ZTE (TX), Inc. ("Defendants"), and would show as follows:

- 1. On October 9, 2020, Defendants filed Motions to Dismiss, respectively, at Dkt. Nos. 23, 24, 25 (corrected by Dkt. 26).
- 2. Pursuant to the Local Rules, WSOU's deadline to file responses to the Motions is October 24, 2020. WSOU requests a three-week extension of its deadlines to November 6, 2020.
- 3. This is the first extension WSOU has requested. The requested extension should cause no delay in the schedule.
- 4. WSOU has consulted with counsel for Defendants, and Defendants have indicated that they do not oppose this extension request.

<sup>&</sup>lt;sup>8</sup> The motions were additionally styled with an alternative relief to transfer. For simplification, the motions will be styled herein as Motions to Dismiss.

WHEREFORE, WSOU respectfully requests that the deadline to file a respond to Defendant's Motions, Dkt. Nos. 23, 24, 25 (corrected by Dkt. 26) be extended to November 6, 2020.

Dated: October 13, 2020 Respectfully submitted,

By: /s/Ryan S. Loveless
James L. Etheridge
Texas Bar No. 24059147
Ryan S. Loveless
Texas Bar No. 24036997
Brett A. Mangrum
Texas Bar No. 24065671
Travis L. Richins
Texas Bar No. 24061296
Jeff Huang
Etheridge Law Group, PLLC
2600 E. Southlake Blvd., Suite 120 / 324
Southlake, TX 76092
Tel.: (817) 470-7249
Fey: (817) 887 5050

Fax: (817) 470-7249
Fax: (817) 887-5950

Jim@EtheridgeLaw.com

Ryan@EtheridgeLaw.com

Brett@EtheridgeLaw.com

Travis@EtheridgeLaw.com

Jeff@EtheridgeLaw.com

## **ATTORNEYS FOR WSOU**

## **CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this October 13, 2020, with a copy of this document via email.

/s/ Ryan S. Loveless Ryan S. Loveless